Before the
PUBLIC UTILITIES COMMISSION OF CALIFORNIA
San Francisco, California 94102

Order Instituting Rulemaking on the Commission's Own Motion into Competition For Local Exchange Service	)	Rulemaking 95-04-043
Order Instituting Investigation on the Commission's Own Motion into Competition For Local Exchange Service	)	Investigation 95-04-044

COMMENTS OF NEUSTAR, INC.

NeuStar, Inc. ("NeuStar"), in its role as the neutral third party Local Number Portability Administrator ("LNPA") and operator of the Number Portability Administration Center ("NPAC"), submits its comments in the above-captioned docket[1] regarding the NPAC's readiness to port numbers related to the migration of a customer's loop from an incumbent local exchange carrier's (ILEC) switch to the competitive local exchange carrier's (CLEC) switch. Specifically, NeuStar addresses concerns raised in the record regarding the capacity of the NPAC to process the large number of ports that may be generated daily as a result of hot cuts[2] from the ILEC switch under unbundled network elements platform (UNE-P) to the CLEC switch utilizing unbundled loops (UNE-L). NeuStar's NPAC system's established track record in meeting past challenges,

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[1] *Proposed Decision of ALJ Pulsifer*, *Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service* (Rulemaking 95-04-043); *Order Instituting Investigation on the Commission's Own Motion into Competition for Local Exchange Service*, Opinion Regarding Hot Cut Processes and Pricing (July 28, 2004) ("*Proposed Decision*").

[2] A hot cut is the process whereby the ILEC manually disconnects the customer's loop from the ILEC's switch and physically rewires it to the CLEC switch. The customer's telephone number is reassigned from the ILEC to the CLEC switch. *Proposed Decision* at fn 1.

its documented performance ability and current volume testing results demonstrate that the NPAC is capable of processing ports in excess of worst-case volume predictions.

INTRODUCTION

The Public Utilities Commission of California (Commission) requests comments on whether the NPAC can handle the volumes of transactions that would occur in a dynamic UNE-L market, given the number of transactions already created by churn and wireless number portability. The Commission also states that it will immediately open a collaborative discussion between the ILEC, CLECs and NeuStar to determine the NPAC's actual capabilities and to develop metrics for the completion of number portability tasks. It states that volume testing or scalability analysis will be required to determine whether the NPAC can handle the volume of numbers that will be ported in a single day.[3] NeuStar is happy to participate in any collaborative or discussions the parties believe are necessary, however, NeuStar has already conducted volumes testing for its NPAC, and it can handle estimated daily volumes as a result of hot cuts to UNE-L switches.

THE NPAC HAS THE VOLUME CAPACITY, PROVEN TRACK RECORD, AND PERFORMANCE STANDARDS NECESSARY TO ACCOMMODATE FORECASTED TRANSACTIONS

The *Proposed Decision* requires NeuStar to perform volume testing to ensure the NPAC can handle the volume of transactions created by batch hot cuts. Successfully completed volumes testing demonstrate that the NPAC can accommodate the number of ports estimated by parties in this record. The largest estimates come from MCI. In its testimony in this proceeding, MCI states that the numbers of ports per month will ramp

[3] *Proposed Decision* at 53.

up from approximately 179,000 ports per month to almost 400,000 ports per month from month five to month 33.[4] NeuStar is confident it can handle those volumes today. Ports per month of 400,000 represents 16 percent of the number of ports the NPAC handled in the most recent full month of July for the West Coast region (California, Hawaii, and Nevada). NeuStar has already successfully tested the NPAC at 2.5 times current volumes, many times the increase projected by MCI and other parties.

NeuStar has a proven track record of meeting significantly escalated volumes of ported telephone numbers resulting from regulatory changes. Most recently, due to the implementation of wireless number portability and pooling, NeuStar increased system capacity six times over previous levels to meet industry's forecast of approximately 65 million wireless transactions in 2004.[5] Wireless porting volumes have fallen short of the numbers estimated and currently stand at less than two fold of the porting volumes that existed before WNP. Therefore, the NPAC has more than enough capacity to handle even the worst-case scenario volumes envisioned for migration of number from UNE-P to UNE-L. Consistent with NeuStar's three-year capital improvement of technology program (last implemented in 2003 for wireless portability), NeuStar thoroughly evaluates its systems on a yearly basis and monitors performance daily. NeuStar, as is its practice, will continue to reevaluate its system to determine if a change is needed to meet

[4] Joint Reply Testimony of Sherry Lichtenberg and Michael Starkey (public version) on behalf of MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc. at p 30, lines 1-12, filed Jan. 15, 2004 in *Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service* (Rulemaking 95-04-043), *Order Instituting Investigation on the Commission's Own Motion into Competition for Local Exchange Service* (Investigation 95-04-044).

[5] In its WNP proceeding, the FCC found that "NeuStar will be able to handle increased pooling and porting volumes as a result of CMRS carriers' participation in number pooling and number portability. *Verizon Wireless's Petition for Partial Forbearance from Commercial Mobile Radio Services Number Portability Obligation* (WT Docket No. 01-184) *and Telephone Number Portability (CC Docket No. 95-116), Memorandum Opinion and Order (July 26, 2002).*

projected industry demand. NeuStar is committed to continually evaluating, testing, and implementing upgrades to its CPU, memory, backbone bandwidth, and system reliability and scalability, all key factors in ensuring that the NPAC will continue to accommodate increased NPAC transactions expected in the coming years.

NeuStar is committed to providing the highest quality service to the industry. The NPAC data center is based upon state-of-the-art technology with a fully operational back-up data center and multiple other redundancies built into the systems to ensure availability and reliability. NeuStar's systems are designed to exceed 99.9 percent availability. Year-to-date, NeuStar's NPAC has been operational and available 99.97% of the time. NeuStar's exceptional performance standards demonstrate its commitment to meeting the needs of the industry at the highest level.

CONCLUSION

NeuStar has carefully considered and evaluated the impact of the migration of customers from UNE-P to UNE-L on NPAC performance. Based upon current capacity of the NPAC as demonstrated by successful volumes testing, NeuStar will not need to add any capacity to handle migrations of customer from UNE-P to UNE-L. As such, NPAC volumes testing for UNE-P to UNE-L migration has been successfully completed and additional testing is unnecessary. NeuStar is happy to participate in any

collaboratives with the service providers and the Commission to address any additional issues.

Respectfully submitted,

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